

EXHIBIT F

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

KYKO GLOBAL, INC., a Canadian corporation, KYKO GLOBAL GmbH, a Bahamian corporation, PRITHVI SOLUTIONS, INC., a Delaware Corporation

Plaintiffs,

v.

PRITHVI INFORMATION SOLUTIONS, LTD, an Indian corporation, VALUE TEAM CORPORATION, a British Virgin Islands corporation, SSG CAPITAL PARTNERS I, L.P., a Cayman Islands Limited Partnership, SSG CAPITAL MANAGEMENT (HONG KONG) LIMITED, a private Hong Kong company, MADHAVI VUPPALAPATI, an individual, ANANDHAN JAYARAMAN, an individual, SHYAM MAHESHWARI, an individual, IRA SYAVITRI NOOR A/K/A IRA NOOR VOURLOUMIS, an individual, DINESH GOEL, an individual, WONG CHING HIM a/k/a Edwin Wong, an individual, ANDREAS VOURLOUMIS, an individual, PRITHVI ASIA SOLUTIONS LIMITED, a Hong Kong company

Defendants.

Case No. 2:18-cv-1290-WSS

**DECLARATION OF KIRAN KULKARNI**

1. I, Kiran Kulkarni, declare as follows.
2. I am Plaintiffs' Director and Chief Executive Officer and am authorized to make this Declaration.

1. I have personal knowledge of the facts and allegations set forth in the Complaint, RICO Case Statement, and Plaintiffs' other submissions in this case and authorized legal counsel to file these documents on Plaintiffs' behalf.

2. I have reviewed the SSG Defendants' First Set of Requests for Production of Documents and First Set of Interrogatories directed to Plaintiffs dated August 11, 2020 ("Discovery Requests").

3. I make this Declaration to seek a reasonable extension of time to allow Plaintiffs to respond to the Discovery Requests based on the circumstances set forth below. In doing so, Plaintiffs expressly reserve their right to make objections to the Discovery Requests.

4. The information sought in the Discovery Requests is primarily maintained with Plaintiffs' legal support team at a corporate affiliate's office located in Pune, India.<sup>1</sup> Thus, while some duplicates of the requested information may be located at Plaintiffs' office located in Brampton, Ontario, Canada it is not possible for Plaintiffs to make a good faith and complete response without accessing the documentation located in Pune, India.

5. Since July 2020, Pune crossed the 50,000 mark to become the city with the maximum number of COVID-19 infected cases in Maharashtra (the state Pune is located) and is one of the worst impacted districts in India.

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<sup>1</sup> By order of Judge Marsha Pechman of the U.S. District Court for the Western District of Washington, Kyko Global Inc. and Kyko Global GmbH obtained ownership of Defendant Madhavi Vuppalapati's computer hard drive. The FBI now has possession of the hard drive. Kyko has a copy located in Brampton, Ontario, Canada. It is my understanding that Plaintiffs' legal counsel objects to the SSG Defendants' request to have Plaintiffs completely turn over our copy of the hard drive to the SSG Defendants. After this objection has been resolved, I can undertake the necessary action as the Court directs.

6. Pune has become India's biggest COVID-19 hotspot and operations in India have been significantly affected as a result. Primarily, this was due to the curfew and city travel restrictions implemented when the pandemic began.

7. Notwithstanding the restrictions and dire situation in Pune, our team in India attempted to begin the process of locating and producing the information sought in the Discovery Requests. This process is necessarily slow for the reasons discussed above. Further compounding the matter, our Head of Indian Operations - and primary document reviewer and information gatherer - became severely ill and was hospitalized with a suspected case of COVID-19. As it turned out, he contracted dengue fever and was recently released from the hospital and will spend the next couple of weeks recuperating with severely limited work responsibilities.

8. Additionally, another document reviewer has tested positive for COVID-19. As a result, the Pune office had to be shutdown and some of the personnel are still in quarantine.

9. Plaintiffs continue to make their best efforts to produce the requested information, but Plaintiffs will not be in a position to properly respond to the Discovery Requests by September 10, 2020. Therefore, Plaintiffs request that they be permitted to respond to the Discovery Requests on or before October 1, 2020.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 7, 2020

A handwritten signature in dark ink, consisting of a stylized capital 'K' followed by a horizontal line.

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Kiran Kulkarni